

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:

Representing Management Exclusively in Workp DATE FILED: 5/18/2020



Jackson Lewis P.C.  
44 South Broadway  
14<sup>th</sup> Floor  
White Plains NY 10601  
Tel 914 872-8060  
Fax 914 946-1216  
[www.jacksonlewis.com](http://www.jacksonlewis.com)

ALBANY NY	GREENVILLE SC	MONMOUTH COUNTY NJ	RALEIGH NC
ALBUQUERQUE NM	HARTFORD CT	MORRISTOWN NJ	RAPID CITY SD
ATLANTA GA	HONOLULU HI*	NEW ORLEANS LA	RICHMOND VA
AUSTIN TX	HOUSTON TX	NEW YORK NY	SACRAMENTO CA
BALTIMORE MD	INDIANAPOLIS IN	NORFOLK VA	SALT LAKE CITY UT
BIRMINGHAM AL	JACKSONVILLE FL	OMAHA NE	SAN DIEGO CA
BOSTON MA	KANSAS CITY REGION	ORANGE COUNTY CA	SAN FRANCISCO CA
CHICAGO IL	LAS VEGAS NV	ORLANDO FL	SAN JUAN PR
CINCINNATI OH	LONG ISLAND NY	PHILADELPHIA PA	SEATTLE WA
CLEVELAND OH	LOS ANGELES CA	PHOENIX AZ	ST. LOUIS MO
DALLAS TX	MADISON, WI	PITTSBURGH PA	STAMFORD CT
DAYTON OH	MEMPHIS TN	PORTLAND OR	TAMPA FL
DENVER CO	MIAMI FL	PORTSMOUTH NH	WASHINGTON DC REGION
DETROIT MI	MILWAUKEE WI	PROVIDENCE RI	WHITE PLAINS NY
GRAND RAPIDS MI	MINNEAPOLIS MN		

\*through an affiliation with Jackson Lewis P.C., a Law Corporation

MY DIRECT DIAL IS: 914-872-6920  
E-MAIL ADDRESS: JOSEPH.DIPALMA@JACKSONLEWIS.COM

May 14, 2020

**Via ECF- Letter Motion**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
United States District Court, Southern District of New York  
40 Foley Square  
New York, New York 10007

MEMO ENDORSED

Re: Vuppala v. J.P.G., LLC, et al.  
Case No.: 19-cv-04233-ALC

Dear Judge Carter:

We represent Defendant, J.P.G. LLC, in the above-captioned matter. We write jointly with Plaintiff's counsel, Brad Weitz, Esq., and co-defendant's counsel, Jeffrey Chancas, Esq., seeking an extension of the existing stay in this matter that is scheduled to expire on May 15, 2020.

Due to the ongoing national health crisis caused by the COVID-19 pandemic, coupled with the mandated closure of non-essential public businesses in New York City, which has adversely affected the business in this matter, it is very difficult for the parties to proceed in this matter with discovery and productive settlement negotiations at this time.

Therefore, the parties jointly hereby respectfully request that the Court grant an additional thirty (30) day stay of all deadlines and/or any conference in this matter. The undersigned has conferred with all counsel who consent to this request. We thank you for your attention and consideration.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Joseph J. DiPalma  
Joseph J. DiPalma

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
May 18, 2020